

EXHIBIT G

State of Michigan  
County of Macomb

AFFIDAVIT OF NANCY JOHNSON

I, Nancy Johnson, being first duly sworn and cautioned, do hereby depose and say:

1. I am a resident of Macomb, Michigan, I am over 18 years of age and am competent to testify about the matters discussed below.
2. I am a former UAW official, having served in the following capacities: Administrative Assistant to UAW International Vice President Norwood Jewell (2014-2016); International Representative of the UAW (2001-2014).
3. While I was in office at the UAW, I became aware of financial improprieties, including some to which I eventually pleaded guilty myself. At the time, I was not aware that specific acts by UAW officials that appeared to benefit FCA were necessarily in exchange for bribes to them by FCA.
4. However, I do know of acts taken and ordered by UAW officials that I thought at the time were very suspicious. I now believe such conduct was influenced by FCA bribes.
5. When Norwood Jewell was named Vice President in charge of FCA in June, 2014, I was named his top assistant. Prior to that, I had been a servicing rep.
6. When we came into office, we inherited a lot of issues that had been left by General Holiefeld.
7. Regarding the long-time temporary part-time (TPT) employees, in 2015, I accompanied Norwood Jewell to several FCA plants to talk with our UAW members about the upcoming contract negotiations. We were bombarded with questions and complaints, mainly in Toledo, but also in other plants, such as in the Detroit area. The complaints

centered around two areas.

- A) There were too many temps in the plants. The number of temps was not supposed to exceed a certain number, according to local contracts. But the union-members with the higher level of seniority did not want to work on alternative work schedules, known as AWS, so FCA put more temps in. With the blessing of the UAW local and regional office, we started investigating, but eventually the International killed the investigation into whether there were too many temps in Toledo. Then, when FCA allowed more full-time employees to be hired, those long-time temps didn't get hired first; FCA hired workers from the Gonzalez plant first, supposedly because Toledo Jeep was not part of the national CBA at that time.
  - B) The other area was people's pay rates; the long-term temps had gotten pay increases over the years, so that after about six or seven years as TPTs, they were at the top of the pay scale for full-time employees, even though they did not receive any benefits. But when they got hired full-time, they were dropped to Tier II wages, which was how FCA interpreted the contract language that was in effect at the time. Norwood Jewell, who had just been placed in the top position within the UAW for dealing with FCA issues, and I, his top assistant, thought it was wrong the way the TPTs were being treated. But by the time Norwood was placed in his position, a lot of the long-term TPTs had already been hired at the Tier II wages.
8. But Alphons Iacobelli from FCA interpreted the contract that way, and Troy Davis, Tim Bressler and Virdell King of the UAW said they thought that the TPTs obtaining benefits

outweighed the loss of wages.

9. Norwood Jewell and I toured many of the plants prior to the 2015 negotiations, and we got an earful from employees who had been TPTs, and we took their issues to the negotiating table in 2015. We also talked with Ken Lortz, who was the Region 2B Director, and we said he had to take care of the temp issue, including long-term temps. Lortz didn't want us to do anything about the temps in Toledo. Ken Lortz wanted temps to stay there, even though it was against the contract to have that many temps. Ken also made special trip to Detroit to talk to Norwood; he wanted to keep temps there to keep his people happy. But to appease Ken, Norwood turned a blind eye. A pathway to top wage was put in to the 2015 contract, but those former temps lost a lot of pay, because they had to re-start on the pathway to the top tier in 2015 (after having already been at the top of the pay scale when they were temps) and it took about six years for them to achieve that top level. A lot of them didn't want to leave being temps because they made more money as temps. It was my view that they should have been made full-time or cut loose and FCA should have put the regular people on alternative work schedule, which Ken didn't want to do.
10. There were a number of other incidents, many of which Norwood and I saw only in the aftermath when Norwood took over General Holiefield's position, or which acquired new meaning in light of the revelation of the Iacobelli indictment in July 2017.
11. For example, when I was a servicing rep, Virdell King told me not to handle any grievances locally, but to send them all up to Detroit. Virdell said, "you don't solve them, you send them up." Virdell worked as a coordinator under General Holiefield, so I understood her message to have come directly from General.

12. Prior to our arrival at Solidarity House in June, 2014, I found out what happened to those grievances that Virdell had told me to send to Detroit; nothing. There were literally hundreds of grievances that had been filed by members, which were sitting in stacks on the desks of secretaries at the end of 2013. Many of them were several years old. I talked with Troy Davis, Tim Bressler and Virdell King, who told me that General Holiefield told them to hold grievances, rather than try to resolve them or arbitrate them. They kept saying their hands were tied. Now I get it. If someone is paying your mortgage, you hold grievances. Troy, Virdell and Tim told me they were told by General not to do anything about them. The whole thing was tainted. The grievances weren't heard and the members had a right have their grievances heard or to an appeal, and someone telling them they had lost their right to appeal, that's not right. When Bob King confronted General about General's then-girlfriend, Monica Morgan, using her private company to sell trinkets and UAW "merch," Bob King also found out about General ordering all of the grievances to be held. Bob put Cindy Suemnick and Miguel Foster in charge of the FCA department temporarily and they had to report directly to Bob. That's when people started going through the grievances and trying to resolve them. But it took awhile because there were so many. This had all occurred before Norwood and I arrived at Solidarity House, ~~that~~ the grievances were sorted out and dealt with, but to me the process was questionable because there were so many.
13. I believe that under General, the bribes had something to do with the stagnated grievances. He was in their pockets. Troy told me that General told him not to process grievances, that his hands were tied.
14. I can think of no other explanation other than bribes for General ordering his people to

stop processing and resolving grievances and then having so many unresolved grievances sitting in stacks.

15. When Norwood took over, he had me set up a meeting with Cindy Suemnick and Miguel Foster, two Bob King union officials, and at the meeting, Cindy told us that something was going on, that FCA won't release some of the company's financial records to the union. We then had a meeting with Iacobelli and he said we don't need to know. Iacobelli came down and said, "there's some things we do that you don't want to know about and there's some things that you do that we don't want to know about." Norwood insisted that record-sharing should be open.
16. Now that I look back on it, I see what was happening. For example, Iacobelli kept trying to put his own guy, Jerome Durden, on Norwood's Make Our Children Smile Foundation. Iacobelli kept pushing Keith Mickens and Lisa Kosal (FCA employee) on Norwood's board. Norwood refused and Iacobelli was visibly upset.
17. Also, FCA did a lot of hiring after bankruptcy, and Virdell King told me that a lot of General's and Monica's relatives worked at the training center (NTC). They got jobs through Iacobelli. Lisa Kosal took tests for General's relatives on weekends, so they could be hired. They and their friends' family-members were hired as Chrysler employees, and placed at the training center. I found out about this when Norwood and I arrived at Solidarity House.
18. There came a time when I became aware that the federal government was investigating General, because James Hardy said he was asked to testify, but I assumed the investigation had to do with Monica Morgan selling trinkets to the UAW. When General died, I assumed the investigation ended. Norwood would have known about the TPT

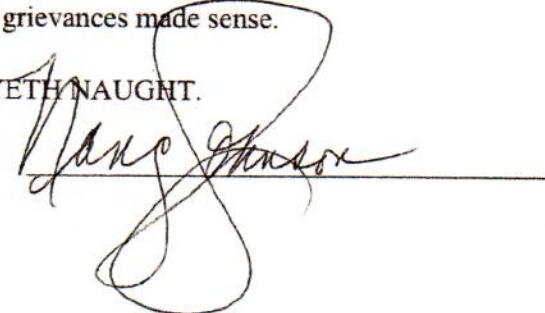
(Slight) lawsuit because whenever an appeal or a lawsuit was filed, legal would send a copy to the vice president of that department. I had discussions with Troy Davis and Tim Bressler about the TPTs in Toledo. Tim was General's right hand, but he became known as Bob King's snitch, so General iced him out and started relying on Troy Davis and James Hardy. But then Hardy sold General out to save himself. Troy said his hands were tied regarding the TPTs in Toledo and that came from General.

19. In December, 2014, Iacobelli arranged a trip to Italy and other parts of Europe to see the WCM (World Class Manufacturing) program in Europe. A number of UAW officials went on the trip, including Norwood and me. We went to Italy, Poland, Germany, Holland. One man, Pat Byers, lost his luggage on the trip, and on the third day, Norwood said a guy who lost luggage needed some clothes. He was hesitant to buy Pat any clothes with his (company-issued) credit card. Iacobelli said the credit card is for you to use, you're JAB (Joint Activities Board) members, and just look at it as another \$12,000 per month in pay. Use it however you want. We'll replace it. I thought that was odd. "I don't know why you were so hesitant to use it," Iacobelli said. Similarly, when General left he took all the furniture from his Training Center office, so I was told to use the credit card from FCA to buy new furniture for Norwood's office, so I did.
20. General was the one who pulled the levers to make these company-friendly positions, but I believe that Dennis Williams knew what was going on, as did Tim Bressler and Bob King. I believe Troy Davis and Virdell King knew something wasn't right, even if they didn't know exactly what was being exchanged for what.
21. I didn't find this out until the negotiations for the 2015 contract, but in 2011, FCA got everything it wanted, and there were basically no negotiations. FCA wrote up the terms

and General agreed to them, with no back-and-forth. With the TPT issue, in 2011, we (the union) got our hats handed to us. Whatever the company suggested, General agreed to. That's why people were upset. General justified giving the company a generous contract by referring to the bankruptcy (from 2009). People complained about the contract, but Troy told me the union had to sit on our hands, there was nothing we could do about it and we shouldn't make waves.

22. The same thing was about to happen in 2015, but Norwood would not allow it. When negotiations started, FCA resisted contract proposals at first, but by that time, Iacobelli had left FCA. Norwood pushed back and tried to present specific items he wanted in the contract. Troy Davis told Norwood that in 2011, the contract was accepted as it was presented by the company and questioned Norwood's thought process. FCA representatives also told Norwood that that's how it was done in 2011, but Norwood wanted to negotiate point-by-point. He did and came out with what he thought was a better contract, but the membership rejected it and sent Norwood back to the bargaining table, where he was able to win a few more contractual gains. If any negotiations were tainted, 2011 was. But by the time of the 2015 negotiations, Iacobelli and General were out and we were able to get a more fair and equitable contract.
23. At the time, I didn't know the specifics of the exchanges between General Holiefield and Alphons Iacobelli, but when I found out that General's mortgage was paid for by FCA and all of the other money and merchandise they gave him and Monica Morgan, the bad contract and sitting on hundreds of grievances made sense.

FURTHER AFFIANT SAYETH NAUGHT.

A handwritten signature in black ink, appearing to read "Dan Sharrow". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

SWORN TO and subscribed in my presence, on this 9<sup>th</sup> day of April, 2021.



NOTARY PUBLIC

